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Attorneys for Defendants
INSURANCE CENTERS OF AMERICA, INC.; ICA INSURANCE ALLIANCE/SAA
INSURANCE AGENCY, AND PHIL FOX

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TIFFANY PLUMMER,)	CASE NO. 3:18-cv-07781-RS
)	
Plaintiff,)	STIPULATION AND ORDER
)	CONTINUING TRIAL DATE
vs.)	
)	
INSURANCE CENTERS OF AMERICA,)	[Civil L.R. 6-2, 7-12]
INC.; ICA INSURANCE ALLIANCE/SSA)	
INSURANCE AGENCY; PHIL FOX, an)	
individual; and DOES 1-50, inclusive)	
)	
Defendant.)	
)	
)	
)	

1 Plaintiff TIFFANY PLUMMER (“Plaintiff”) and Defendants INSURANCE CENTERS
2 OF AMERICA, INC., ICA INSURANCE ALLIANCE/SAA INSURANCE AGENCY, and
3 PHIL FOX (collectively, “Defendants”) hereby stipulate and respectfully request that the date for
4 Jury Selection and Trial be continued from August 17, 2020 to September 21, 2020 at 9:00 a.m..¹

5 The parties believe that good cause exists to continue this deadline based on the following:

6 On January 16, 2020, the Parties submitted a Stipulation and [Proposed] Order
7 Continuing Deadlines for Expert Disclosure and Discovery and Pretrial Motions. Dkt. 18.

8 On January 17, 2020, the Court filed an Order as Modified by the Court that included
9 revised deadlines for the disclosure and discovery of expert witnesses, a revised deadline for
10 pretrial motions to be heard, and continued the date for jury selection and trial to August 17,
11 2020. Dkt. 19.

12 Daniel Feder, counsel for Plaintiff, has two other trials/arbitrations that would create a
13 conflict with the August 17, 2020 trial date.

14 Seth Weisburst, counsel for Defendants, has a previous family commitment to be in
15 Massachusetts from August 16-24, 2020, for which he has already purchased airline tickets and
16 coordinated other travel plans and expenses. The parties have conferred and can confirm their
17 availability to proceed with jury selection and trial approximately one month later, on September
18 21, 2020.

19 Therefore, the parties ask the Court to continue the date for jury selection and trial from
20 August 17, 2020 to September 21, 2020 at 9:00 a.m.

21 Respectfully submitted,

22 Dated: January 21, 2020

GORDON REES SCULLY MANSUKHANI, LLP

23 By: /s/ Seth Weisburst

24 Michael D. Bruno

Seth Weisburst

Attorneys for Defendants

INSURANCE CENTERS OF AMERICA,
INC.; ICA INSURANCE ALLIANCES/SSA
INSURANCE AGENCY; and PHIL FOX

27 ¹ If the Court is unavailable the week of September 21, 2020, the Parties respectfully request
28 further information about the Court’s availability and/or a brief conference with the Court during
which the Parties and the Court can confer regarding scheduling trial.

1 Dated: January 21, 2020

LAW OFFICES OF DANIEL FEDER

3 By: /s/ Daniel Feder

4 Daniel Feder
5 Attorneys for Plaintiff
6 TIFFANY PLUMMER

FILER'S ATTESTATION

7 Pursuant to Civil L.R. 5-1(i)(3), I attest that I received concurrence of the signatories in
8 the filing of this document.

9 /s/ Seth Weisburst

Seth Weisburst

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1. I am an attorney licensed to practice law in the State of California and I am admitted to practice before this Court. I am counsel of record for Defendants. I submit this declaration in support of the parties' stipulated request to continue the jury selection and trial date in this matter from August 17, 2020 to September 21, 2020.

3. I had previously committed to a long-planned trip with my wife, son, parents, and siblings to Massachusetts from August 16-24, 2020. I have already purchased airline tickets and coordinated other travel plans and expenses, including renting a house. Based on this scheduling conflict, the parties respectfully request that the Court continue the trial date so as not to fall during the week of August 17, 2020 or the week of August 24, 2020.

4. The parties filed a stipulation on January 16, 2020 requesting time modifications on dates for expert disclosures, expert discovery, and the last day to hear pretrial motions. Dkt. 16. The parties' March 19, 2019 Joint Case Management Statement and Rule 26(f) Report first proposed deadlines related to expert disclosures and discovery and pretrial motions. Dkt. 9. On April 12, 2019, the Court filed a Case Management Scheduling Order setting several deadlines, including those related to expert disclosures and discovery and the last day the Court would hear pretrial motions. Dkt. 12. The parties proposed revised deadlines in their December 4, 2019 Joint Case Management Statement. Dkt. 14. On December 12, 2019, the Court entered a Further Case Management Scheduling Order setting several deadlines, including those related to expert disclosures and discovery and the last day the Court would hear pretrial motions. Dkt. 16. On January 17, 2020, the Court entered an order setting revised deadlines for expert disclosures,

1 expert discovery, pretrial motions, and the jury selection/trial date that is the focus of this
2 Stipulation and [Proposed] Order.

3 I declare under penalty of perjury under the laws of the United States of America that
4 the foregoing is true and correct.

5 Executed on January 21, 2020 at San Francisco, California.

6
7 /s/ Seth Weisburst

Seth Weisburst

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ORDER

Having reviewed the parties' stipulation, and good cause having been shown, the Court orders as follows:

1. The Jury Selection/Trial has been continued to September 21, 2020.

IT IS SO ORDERED.

Dated: 1/22/2020


The Honorable Richard Seeborg
United States District Judge